



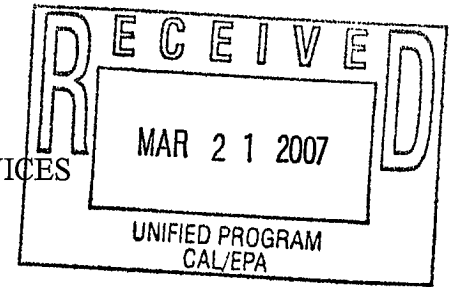
**COUNTY OF DEL NORTE**  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
PUBLIC HEALTH BRANCH

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To: Jennifer Lorenzo, Environmental Scientist, CalEPA Unified Programs

From: Leon A. Perreault, Del Norte County Health and Human Services CUPA

LAP

Date: March 14, 2007

Subject: Response to CUPA Deficiency Status Report Request (email) of December 27, 2006:

Dear Ms. Lorenzo:

Please find enclosed our corrective action responses and supporting documentation for the deficiencies mentioned in the above-referenced email:

**Deficiency 5**

I have performed 7 UST inspections during the period of July 1, 2006 through February 28, 2007, but there were no UST inspections done in July through December, 2006 because of my being out of the office due to injury. My goal is to inspect every UST facility during this calendar year and, hopefully, most will be inspected by the end of the 2006-2007 fiscal year. One additional inspection is already scheduled for April 2, 2007.

There are currently 19 UST facilities, of which three are under temporary closure.

Also, three UST facilities will probably have their tanks removed by the end of the fiscal year—CHP/Crescent City, Crescent City Wastewater Treatment Plant, and Pelican Bay State Prison. Sutter Coast Hospital may also be removing their UST and replacing it with a Convault sometime during 2007.

**Deficiency 6**

Enclosed please find documentation for two UST facilities, including their application, current permit, and a copy of their last inspection report. We have not issued any permits

besides these during this fiscal year. We *will* be reissuing every UST permit during 2007 since the name of our agency has changed and the permits will need to be rewritten to show the new agency name—Del Norte County Health and Human Services CUPA.

By the way, do we need to do anything (reapply as a CUPA, for example) if our agency name has changed?

### **Deficiency 7**

Thank you for the explanation regarding entries on Summary Report 3, Columns 2 and 3, relative to CalARP facilities. We will report more accurately in the future.

Our inspection goals for Fiscal Year 2006/2007 include a minimum of 18 HMRRP facility inspections, of which 5 are already completed. This number of routine inspections along with last year's inspections will total 2/3 of our HMRRP facilities inspected for the two-year period. One CalARP facility may be visited this fiscal year as their RMP is due next fiscal year.

This CUPA previously wrote combined routine post-inspection reports that included non-compliance observations for facilities that had an HMBP and were a hazardous waste generator. We were found deficient during a previous CUPA audit for not leaving a Notice of Violation at the time of inspection for the waste generator violations. We have since changed procedures to include a Notice of Violation at the time of inspection.

We now inform the facility that their HMBP inspection is due and usually require the HMBP be completely updated and a copy submitted to the CUPA prior to the routine inspection. The inspection then generally becomes a determination of whether "what's on the paper is what's on the site." Necessary corrections can then be made to the HMBP at inspection time and an actual inspection report is rarely needed.